

# Exhibit 1

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
MIDLAND-ODESSA DIVISION

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ROY PRUITT,

*Plaintiff,*

v.

FAB TECH DOWNHOLE, LLC and  
SHANNON D. COAN

*Defendants.*

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C.A. No. MO:22-CV-00151-DC-RCG

JURY TRIAL DEMANDED

DECLARATION OF CARTER HASTINGS

I, Carter Hastings, being of sound mind and over the age of 18, make the following statements.

1. The facts contained in this declaration are within my personal knowledge and are true and correct.

2. I am an associate attorney of Anderson Alexander, PLLC, and have served as lead counsel for the Plaintiff in this case.

3. I submit this declaration in support of the Plaintiff's Motion for Attorneys' Fees and Costs ("Motion"). I have reviewed the Motion and the facts contained therein are true and correct.

4. Anderson Alexander, PLLC is a plaintiff and employee-side law firm that was founded in 2016 by Clif Alexander and Austin W. Anderson. Our firm practices almost exclusively in the area of labor and employment—specifically, in wage and hour law throughout the United States. We devote 95% of our practice to representing workers in class and collective actions under the Fair Labor Standards Act ("FLSA"), 29 U.S.C. §§ 201–19, and various state wage laws. I, and the attorneys who performed services in this matter, have extensive experience litigating complex wage and hour cases under the FLSA. Since 2016, we have represented hundreds of thousands of employees in individual, collective, and class actions seeking unpaid wages for work performed throughout the United States.

5. I have spent my career litigating collective, class, and mass action lawsuits and have been counsel in hundreds of individual, collective, and class action wage and hour cases across the United States. I have been licensed for seven (7) years and focus my practice on representing wage and hour clients throughout the United States.

6. I received my J.D. from Southern Methodist University in Dallas in 2016. I am licensed to practice law in the State of Texas and am admitted to practice in the following district courts: the Southern, Western, Eastern, and Northern Districts of Texas, the Northern District of Illinois, the Central District of Illinois, and the Eastern District of Michigan. I have litigated cases, either as an admitted attorney, or *pro hac vice*, in the federal district courts of Arizona, Utah, Washington, California, New Mexico, Colorado, Oklahoma, Kansas, Kentucky, Missouri, Pennsylvania, Ohio, Illinois, Texas, Louisiana, Arkansas, Georgia, Alabama, Florida, Tennessee, South Carolina, Virginia, Wisconsin, Michigan, Vermont, New York, and North Carolina.

7. I am involved in many professional organizations and keep abreast of the ever-changing body of laws related to employment on a federal and state level. I am a member of the National Employment Lawyers Association (“NELA”), and the Texas Employment Lawyers Association (“TELA”). I am also very active in my local bar association and served as a director and president for the Corpus Christi Young Lawyers Association. I also participate in multiple employment-specific listservs and have presented several Continued Learning Education seminars on Wage and Hour topics.

8. My hourly rate in this case is \$450.00, and that amount is commensurate with the amount reasonably charged by other legal practitioners of my skill and experience specializing in collective and class actions arising under the Fair Labor Standards Act (“FLSA”) and related state wage and hour laws in this District.

9. Clif Alexander, founding partner of Anderson Alexander, PLLC, also performed work on behalf of Plaintiff. He has dedicated his career to litigating collective, class and mass action lawsuits and have been lead counsel in hundreds of individual, collective, and class action wage and hour cases across the United States. Mr. Alexander has been licensed for fifteen (15) years and focuses his practice on representing wage and hour clients throughout the United States. Mr. Alexander received his J.D. from South Texas College of Law-Houston in 2008 and is licensed to practice law in the State of Texas and admitted to practice before the United States Supreme Court, the United States Courts of Appeals for the Federal Circuit, and the Fourth, Fifth, and Eleventh Circuits. Mr. Alexander is also admitted to practice in the following federal district courts: the Southern, Western, Eastern, and Northern Districts of Texas, the Court of Federal Claims, the District of Colorado, the Central District of Illinois, District of New Mexico, and the Eastern District of Michigan. He have litigated cases, either as an admitted attorney, or *pro hac vice*, in the federal district courts of Arizona, Utah, Washington, California, New Mexico, Colorado, Oklahoma, Iowa, Kansas, Kentucky, Missouri, Pennsylvania, Ohio, Illinois, Texas, Louisiana, Mississippi, Arkansas, Georgia, Alabama, Florida, Tennessee, South Carolina, Virginia, Wisconsin, Michigan, Vermont, New York, Massachusetts, Maine, and North Carolina.

10. Mr. Alexander is involved in many professional organizations and keeps abreast of the ever-changing body of laws related to employment on a federal and state level. He is a member of the American Association for Justice (“AAJ”), National Employment Lawyers Association (“NELA”), the Texas Employment Lawyers Association (“TELA”), and the Texas Trial Lawyers Association (“TTLA”), and regularly attends and speaks at their conferences. He is also very active in his local bar association and served as a director and president for the Corpus Christi Young Lawyers Association and the Corpus Christi Bar Association. He also participates in multiple employment-specific listservs. Mr. Alexander’s hourly rate in this case is \$650.00, and that amount is commensurate with the amount reasonably charged by other legal practitioners of my skill and experience specializing in collective and

class actions arising under the Fair Labor Standards Act (“FLSA”) and related state wage and hour laws in this District.

11. Lauren Braddy, a senior attorney with Anderson Alexander, PLLC, has also performed work on behalf of Plaintiff in this matter. Ms. Braddy has been licensed for more than thirteen (13) years and graduated with honors from Baylor University School of Law in 2010. Early in her career, Ms. Braddy served as defense counsel representing large and small corporations with a nation-wide docket in federal and state courts and subsequently worked as a staff attorney for the Thirteenth Court of Appeals in Corpus Christi, Texas. Ms. Braddy joined Anderson Alexander, PLLC in 2015, and since that time, has focused on in representing plaintiffs across the United States in complex representative actions, including class and collective alleging violations of federal and state laws. Ms. Braddy is admitted to practice before the United States Supreme Court, the Court of Appeals for the Fourth, Fifth, and Eleventh Circuits, the Southern, Western, Eastern, and Northern Districts of Texas, the Court of Federal Claims, the District of Colorado, the Central District of Illinois, the District of New Mexico, and the Eastern District of Michigan. Ms. Braddy has litigated cases, either as an admitted attorney, or pro hac vice, in the federal district courts of Arizona, California, New Mexico, Colorado, Oklahoma, Iowa, Pennsylvania, Ohio, Texas, Louisiana, Virginia, Utah, and Alabama. Ms. Braddy is involved in many professional organizations and is a member of the Trial Lawyers Association (“TTLA”), the National Employment Lawyers Association (“NELA”), the Texas Employment Lawyers Association (“TELA”) and has been a speaker for multiple events, both at national conferences and locally within her community. Ms. Braddy is very active in her local bar associations and had long served as a director for the Corpus Christi Young Lawyers Association and is the current President for the Coastal Bend Women Lawyers Association. Ms. Braddy’s typical hourly rate is \$500.00 an hour, and that rate is reasonable for an attorney of her skill and experience in this specialized body of law in this District.

12. Cliff Gordon, a senior attorney with ANDERSON ALEXANDER, PLLC, has also performed work on behalf of Plaintiffs and Class Members in this matter. Mr. Gordon has been a practicing attorney for almost twenty-five years and has worked in complex civil litigation as both a defense and plaintiffs’ attorney. Mr. Gordon began working with ANDERSON ALEXANDER, PLLC in 2016 and since that time has practiced almost exclusively in complex representative civil litigation, including class and collective actions. Mr. Gordon works diligently to ensure that his clients receive the compensation legally owed to them and to effectively communicate with the clients through all phase of the litigation. Mr. Gordon obtained his undergraduate degree from Yale University and is a 1995 graduate of the University of Houston Law Center. Mr. Gordon is licensed in the state of Texas and is admitted to practice before all of the federal districts in Texas, and the Eastern District of Michigan. Mr. Gordon’s typical hourly rate is \$650.00 an hour, and that rate is reasonable for an attorney of his skill and experience in this specialized body of law in this District.

13. The above attorneys with the law firms of Anderson Alexander, PLLC have represented hundreds of thousands of employees in collective and class action wage and hour litigation. As such, I can verify that I am familiar not only with this complex area of the law, but that I am also familiar with Plaintiff’s claims.

14. Plaintiff’s Counsel have invested over one hundred sixty-eight (168) hours in the litigation of this matter, after the exercise of billing discretion. I have not submitted any time that was expended on an issue upon which Plaintiff was not ultimately successful. The lodestar in this matter

is conservatively \$ \$85,232.50 The billing records for Anderson Alexander, PLLC are hereby attached as Exhibit A.

15. To date, Plaintiff's Counsel has incurred recoverable litigation costs of \$3,191.52. These costs include fees Plaintiff's Counsel would typically charge a client, and are identified below.

<b>Case Expense Report</b>		
7:22-cv-00151-DC; <i>Roy Pruitt v. Fab Tech Downhole, LLC and Shannon D. Coan</i>		
	<b>Description</b>	<b>Amount</b>
	Filing Fee	\$402.00
	Service of Process on Fab Tech	\$95.00
	Service of Process on Shannon D. Coan	\$95.00
	The Clifford Law Firm Mediation Fee	\$2,000.00
	Westlaw	\$250.00
	Secretary of State	\$5.00
	Pacer	\$15.80
	Adobe E-Sign	\$11.90
	Adobe Acrobat Pro	\$194.76
	Docketbird	\$75.00
	Postage	\$47.06
	Total:	<u>\$3,191.52</u>

16. In choosing to accept representation and engage in the litigation of this matter, Plaintiff's Counsel was unable to accept other promising cases. As a small law firm with limited resources, we are unable to accept every viable case.

17. The attorney-client contract between Anderson Alexander, PLLC and Plaintiff Viviani, provided for representation on a contingent fee basis. Anderson Alexander, PLLC agreed to cover all case expenses and litigation costs (up to and including being responsible for Defendant's statutory court costs in the event it prevailed on the merits). The Agreement provides that the firm is entitled to either a 40% contingency fee of the gross settlement amount, in addition to reimbursement of litigation costs and expenses actually incurred or their billable hours should they prevail on the merits.

18. Based on the foregoing, the undersigned declarant respectfully requests that this Court approve the Settlement Agreement and Release between the parties and authorize the manner and method of the distribution of the settlement, as discussed therein.

19. I declare under the penalty of perjury that the foregoing information is true and correct.

Executed on: 1/19/24 16:42 CST

Signed by: *Carter T. Hastings*  
Carter Hastings

# Exhibit A



Time Records for Anderson Alexander, PLLC					
Date	Time-Keeper	Task	Time	Rate	Fee
3/17/22	Carter Hastings	Initial Client Intake	1.20	\$450.00	\$ 540.00
3/19/22	Carter Hastings	Investigation of defendant company, its litigation history, cases, inclusion in FLSA, and whether atty fees are recoverable and if they are proportional to amount recovered	1.50	\$450.00	\$ 675.00
3/19/22	Carter Hastings	draft case memo with case facts, legal analysis, and defendant information and submit to WCA	2.20	\$450.00	\$ 990.00
3/19/22	Carter Hastings	Review case memo from CTH	1.40	\$450.00	\$ 630.00
3/19/22	Clif Alexander	Meeting with WCA over Case Memo and whether to take case.	1.00	\$650.00	\$ 650.00
3/20/22	Carter Hastings	Meeting with CTH over intake notes and case memo	0.60	\$450.00	\$ 270.00
3/20/22	Clif Alexander	Meeting with CTH over intake notes and case memo	0.60	\$650.00	\$ 390.00
3/21/22	Carter Hastings	Call with Client to take case, explain expectations for the case, additional follow up on facts and available documents	1.00	\$450.00	\$ 450.00
4/22/22	Carter Hastings	Begin drafting original complaint (ECF No. 1)	1.80	\$450.00	\$ 810.00
5/3/22	Carter Hastings	Continue drafting complaint (ECF No. 1)	0.60	\$450.00	\$ 270.00
5/5/22	Carter Hastings	Call with client for potential joint employer claim, gather facts which would support joint employer	0.50	\$450.00	\$ 225.00
5/5/22	Carter Hastings	Legal research for potential joint employer claim.	1.00	\$450.00	\$ 450.00
5/10/22	Carter Hastings	Investigate company owner for joint employer claim.	1.40	\$450.00	\$ 630.00
5/11/22	Carter Hastings	Discuss joint employer issue and whether to plead claim with WCA	0.50	\$450.00	\$ 225.00
5/11/22	Clif Alexander	Discuss joint employer issue with CTH	0.50	\$650.00	\$ 325.00
5/25/22	Carter Hastings	Amend original complaint, add joint employer claim (ECF No. 1)	1.20	\$450.00	\$ 540.00
6/6/22	Carter Hastings	Review and edit original complaint (ECF No. 1)	0.75	\$450.00	\$ 337.50
6/6/22	Clif Alexander	Review and edit complaint	1.00	\$650.00	\$ 650.00
6/28/22	Carter Hastings	Review edits by others to complaint, discuss complaint with client	1.10	\$450.00	\$ 495.00
6/28/22	Cliff Gordon	Review and edit draft of original complaint (ECF No. 1)	1.50	\$650.00	\$ 975.00
6/29/22	Carter Hastings	Final review of original complaint prior to filing	0.75	\$450.00	\$ 337.50

7/13/22	Carter Hastings	Review and Send multiple emails with Opposing Counsel re: setting up time to talk about case	0.20	\$450.00	\$	90.00
7/15/22	Carter Hastings	Review and Send multiple emails with Opposing Counsel re: setting up time to talk about case	0.20	\$450.00	\$	90.00
8/1/22	Carter Hastings	Telephonic Conference with Opposing Counsel re: Settlement, Case Status	0.50	\$450.00	\$	225.00
8/9/22	Carter Hastings	Discussion with Paralegal Bianca Mancilla re: discovery and information needed from client for follow up call	0.30	\$450.00	\$	135.00
8/9/22	Carter Hastings	Call with Client re: information on documents he provided to us.	0.75	\$450.00	\$	337.50
8/10/22	Carter Hastings	Review Defendants' Answer (ECF No. 4)	0.75	\$450.00	\$	337.50
8/12/22	Carter Hastings	Reviewed Documents provided by client	2.50	\$450.00	\$	1,125.00
8/13/22	Carter Hastings	Compared client invoices and payroll received.	3.20	\$450.00	\$	1,440.00
8/14/22	Carter Hastings	Call with Client re: on case status	0.50	\$450.00	\$	225.00
8/17/22	Carter Hastings	Review Court Advisory (ECF No. 5)	0.20	\$450.00	\$	90.00
8/24/22	Carter Hastings	Print and sign non consent to Magistrate Judge	0.30	\$450.00	\$	135.00
9/27/22	Carter Hastings	Read Order re: Scheduling recommendations (ECF No. 8)	0.50	\$450.00	\$	225.00
9/27/22	Carter Hastings	Read Judge Count's specific rules for case management, MSJ, Discovery	0.50	\$450.00	\$	225.00
9/28/22	Carter Hastings	Draft Rule 26(f) Report	1.50	\$450.00	\$	675.00
10/20/22	Carter Hastings	Draft damage model	3.10	\$450.00	\$	1,395.00
10/23/22	Carter Hastings	Draft demand	2.80	\$450.00	\$	1,260.00
10/23/22	Carter Hastings	Legal Research in Support of Demand	3.50	\$450.00	\$	1,575.00
10/23/22	Carter Hastings	Call with client re: discuss damages, questions on documents sent to us, general update on case	0.40	\$450.00	\$	180.00
10/26/22	Carter Hastings	Draft Motion to Stay (ECF No. 9)	0.50	\$450.00	\$	225.00
10/26/22	Carter Hastings	Read WCA edits to demand, finalize demand	0.40	\$450.00	\$	180.00
10/26/22	Carter Hastings	Call with Client re: review demand	0.50	\$450.00	\$	225.00
10/26/22	Carter Hastings	Email to Opposing Counsel: re: Motion to Stay draft (ECF No. 9)	0.20	\$450.00	\$	90.00
10/26/22	Clif Alexander	Review and edit settlement demand	1.00	\$650.00	\$	650.00



10/27/22	Carter Hastings	Sent emails to Opposing Counsel and read responses re: Motion to Stay	0.20	\$450.00	\$	90.00
10/27/22	Carter Hastings	Telephonic Conference with Opposing Counsel re: Motion to Stay	0.50	\$450.00	\$	225.00
11/21/22	Carter Hastings	Email to Opposing Counsel re: settlement, Rule 26(f) report	0.20	\$450.00	\$	90.00
11/28/22	Carter Hastings	Telephonic Conference with Opposing Counsel re: Settlement, Rule 26(f) report	0.40	\$450.00	\$	180.00
11/28/22	Carter Hastings	Draft and file Notice to Court (ECF No. 10)	0.30	\$450.00	\$	135.00
11/28/22	Carter Hastings	Emailed Opposing Counsel re: Rule 26(f) report	0.20	\$450.00	\$	90.00
11/29/22	Carter Hastings	Call with client re: Case Status	0.40	\$450.00	\$	180.00
12/19/22	Carter Hastings	Emailed Opposing Counsel re: follow up on missing settlement demand response	0.10	\$450.00	\$	45.00
1/2/23	Carter Hastings	Call with client re: Case Status	0.30	\$450.00	\$	135.00
1/4/23	Carter Hastings	Emailed Opposing Counsel re: follow up on missing settlement demand response	0.10	\$450.00	\$	45.00
1/26/23	Carter Hastings	Emailed Opposing Counsel re: follow up on missing settlement demand response	0.10	\$450.00	\$	45.00
2/17/23	Carter Hastings	Call with Client re: case status and discovery inquiry	0.70	\$450.00	\$	315.00
2/17/23	Carter Hastings	Draft Discovery Requests	2.10	\$450.00	\$	945.00
2/19/23	Carter Hastings	Continue drafting and editing discovery requests	1.80	\$450.00	\$	810.00
2/20/23	Carter Hastings	Emailed Opposing Counsel re: Sent Discovery Requests.	0.10	\$450.00	\$	45.00
2/20/23	Carter Hastings	Read CG's edits to discovery and finalized discovery requests	0.50	\$450.00	\$	225.00
3/24/23	Carter Hastings	Email Opposing Counsel re: missing discovery responses	0.10	\$450.00	\$	45.00
3/24/23	Carter Hastings	discussion with WCA and CG on case status.	0.50	\$450.00	\$	225.00
3/24/23	Clif Alexander	Meet with CTH and ACG on case status	0.50	\$650.00	\$	325.00
3/27/23	Carter Hastings	Sent and Received emails with Opposing Counsel re: missing discovery responses, setting up time for phone call	0.20	\$450.00	\$	90.00
3/28/23	Carter Hastings	Emailed Opposing Counsel re: missing discovery responses and attempt to set up phone call	0.10	\$450.00	\$	45.00

3/31/23	Carter Hastings	Emailed Opposing Counsel re: missing discovery responses and attempt to set up phone call, missing response to settlement demand, Received and Read Email from Opposing Counsel	0.20	\$450.00	\$	90.00
4/3/23	Carter Hastings	Called Opposing Counsel re: Missing discovery responses	0.10	\$450.00	\$	45.00
4/4/23	Carter Hastings	Sent and Received emails with Opposing Counsel re: missing discovery responses, setting up time for phone call	0.30	\$450.00	\$	135.00
4/4/23	Carter Hastings	Called Opposing Counsel re: Missing discovery responses, Missing Demand Response	0.10	\$450.00	\$	45.00
4/5/23	Carter Hastings	Call with client re: Case Status	0.50	\$450.00	\$	225.00
4/11/23	Carter Hastings	Sent and Received emails with Opposing Counsel re: missing discovery responses, setting up time for phone call	0.20	\$450.00	\$	90.00
4/12/23	Carter Hastings	email OC	0.10	\$450.00	\$	45.00
4/14/23	Carter Hastings	Discussion with CG on missing discovery and motion to compel (ECF No. 14)	0.40	\$450.00	\$	180.00
4/14/23	Carter Hastings	Emailed Opposing Counsel re: missing discovery responses and attempt to set up phone call	0.10	\$450.00	\$	45.00
4/14/23	Carter Hastings	Telephonic Conference with Opposing Counsel re: missing discovery, mediation	0.40	\$450.00	\$	180.00
4/14/23	Carter Hastings	Review draft motion to compel (ECF No. 14).	0.30	\$450.00	\$	135.00
4/14/23	Carter Hastings	Read email from Opposing Counsel re: Mediation	0.10	\$450.00	\$	45.00
4/14/23	Carter Hastings	Discuss with WCA and CG re: case status, mediation	0.50	\$450.00	\$	225.00
4/14/23	Carter Hastings	Sent emails to Opposing Counsel and read responses re: Potential Mediators	0.20	\$450.00	\$	90.00
4/14/23	Clif Alexander	Meet with CTH and ACG on case status	0.50	\$650.00	\$	325.00
4/14/23	Cliff Gordon	Research and prepare motion to compel discovery (ECF No. 14)	6.5	\$650.00	\$	4,225.00
4/17/23	Carter Hastings	Call with Mediator, and emailed available dates to Opposing Counsel	0.50	\$450.00	\$	225.00
4/18/23	Carter Hastings	Sent emails to Opposing Counsel and read responses re: Potential Mediators and available dates	0.30	\$450.00	\$	135.00
4/25/23	Carter Hastings	Email to Opposing Counsel: re: potential mediators	0.10	\$450.00	\$	45.00
4/26/23	Carter Hastings	Email to Opposing Counsel: re: potential mediators	0.10	\$450.00	\$	45.00

4/27/23	Carter Hastings	final review of motion to compel prior to filing (ECF No. 14)	0.20	\$450.00	\$	90.00
4/28/23	Carter Hastings	read email from Opposing Counsel re: mediators	0.10	\$450.00	\$	45.00
4/28/23	Carter Hastings	Email to mediator re: available dates for mediation; Read mediator response re: available dates	0.20	\$450.00	\$	90.00
4/28/23	Carter Hastings	Email to Opposing Counsel re: available mediation dates	0.10	\$450.00	\$	45.00
5/11/23	Carter Hastings	Email to Opposing Counsel re: mediation dates follow up	0.10	\$450.00	\$	45.00
5/16/23	Carter Hastings	Sent and Received emails with Opposing Counsel re: mediation dates	0.20	\$450.00	\$	90.00
5/17/23	Carter Hastings	Draft motion to stay (ECF No. 15) and send to Opposing Counsel	0.50	\$450.00	\$	225.00
5/22/23	Carter Hastings	Email to Opposing Counsel re: motion to stay follow up	0.10	\$450.00	\$	45.00
5/24/23	Carter Hastings	Email to Opposing Counsel re: motion to stay follow up	0.10	\$450.00	\$	45.00
5/24/23	Carter Hastings	Read email from Opposing Counsel re: Motion to stay (ECF No. 15)	0.10	\$450.00	\$	45.00
5/25/23	Carter Hastings	Call with Client re: Case status	0.50	\$450.00	\$	225.00
6/10/23	Carter Hastings	Draft mediation brief and associate legal research	4.50	\$450.00	\$	2,025.00
6/11/23	Carter Hastings	Draft mediation brief exhibits	0.80	\$450.00	\$	360.00
6/15/23	Carter Hastings	Read edits to mediation brief and finalize brief	0.75	\$450.00	\$	337.50
6/15/23	Clif Alexander	Review and edit mediation brief	1.00	\$650.00	\$	650.00
6/16/23	Carter Hastings	Send mediator mediation brief and exhibits	0.20	\$450.00	\$	90.00
6/18/23	Carter Hastings	Review evidence, coinduct additional legal research, and prepare for mediation	2.50	\$450.00	\$	1,125.00
6/18/23	Carter Hastings	Call with Client re case status and mediation	0.50	\$450.00	\$	225.00
6/19/23	Carter Hastings	Call with client re: case status and mediation	0.40	\$450.00	\$	180.00
6/19/23	Carter Hastings	Attend mediation	5.00	\$450.00	\$	2,250.00
6/19/23	Carter Hastings	Send emails to and read responses from Opposing Counsel re: settlement	0.20	\$450.00	\$	90.00
6/19/23	Carter Hastings	Telephonic Conference with Opposing Counsel re: settlement, mediator's proposal	0.40	\$450.00	\$	180.00
6/20/23	Carter Hastings	Draft Joint Status Report (ECF No. 17)	0.40	\$450.00	\$	180.00

6/20/23	Carter Hastings	Emailed Joint Status Report (ECF No. 17) to Opposing Counsel	0.10	\$450.00	\$	45.00
6/20/23	Carter Hastings	Planning meeting with WCA and CG on remaining deadlines and trial	0.40	\$450.00	\$	180.00
6/20/23	Clif Alexander	Meet with CTH and ACG on case status	0.40	\$650.00	\$	260.00
6/25/23	Carter Hastings	Draft motion to extend scheduling order deadlines (ECF No. 18)	0.50	\$450.00	\$	225.00
6/26/23	Carter Hastings	Email Opposing Counsel re: settlement, motion to extend scheduling order deadlines	0.10	\$450.00	\$	45.00
6/27/23	Carter Hastings	Read Court Order Granting Motion to Compel (ECF No. 19), and to Lift Stay (ECF No. 20)	0.30	\$450.00	\$	135.00
6/29/23	Carter Hastings	Telephonic Conference with Opposing Counsel re: settlement, Order to Compel	0.30	\$450.00	\$	135.00
6/29/23	Carter Hastings	Emailed copy of Order granting Motion to Compel (ECF No. 19) to opposing counsel.	0.10	\$450.00	\$	45.00
7/10/23	Carter Hastings	Call with client re: Case Status	0.60	\$450.00	\$	270.00
7/11/23	Carter Hastings	Draft facts section for Motion for Summary Judgment and discuss Motion for Summary Judgment (ECF No. 22) with CG	2.30	\$450.00	\$	1,035.00
7/18/23	Cliff Gordon	Research and prepare motion for summary judgment (ECF No. 22-1)	7.5	\$650.00	\$	4,875.00
7/19/23	Cliff Gordon	Prepare Pruitt's declaration (ECF No. 22-1) for summary judgment	2.3	\$650.00	\$	1,495.00
7/19/23	Cliff Gordon	Prepare Hastings's declaration (ECF No. 22-2) for summary judgment	0.9	\$650.00	\$	585.00
7/19/23	Cliff Gordon	Continued preparation of motion for summary judgment (ECF No. 22-1, 22-2)	2.5	\$650.00	\$	1,625.00
7/20/23	Carter Hastings	Review and edit Declarations in support of MSJ (ECF Nos. 22-1, 22-2)	0.50	\$450.00	\$	225.00
7/20/23	Carter Hastings	Call with client re: declaration in support of MSJ (ECF No. 22-1)	0.75	\$450.00	\$	337.50
7/20/23	Carter Hastings	Final edits to MSJ (ECF No. 22)	0.50	\$450.00	\$	225.00
7/20/23	Cliff Gordon	Continued preparation of motion for summary judgment (ECF No. 22-1)	3.5	\$650.00	\$	2,275.00
8/15/23	Carter Hastings	Call with Client re Case Status	0.50	\$450.00	\$	225.00
9/19/23	Carter Hastings	Call with Client re: Case Status	0.40	\$450.00	\$	180.00
9/20/23	Carter Hastings	Meeting with WCA and CG on status and trial preparation	0.50	\$450.00	\$	225.00

9/20/23	Clif Alexander	Meet with CTH and ACG on case status	0.50	\$650.00	\$	325.00
9/21/23	Carter Hastings	Draft Notice of completion of briefing (ECF No. 23)	0.20	\$450.00	\$	90.00
9/21/23	Carter Hastings	Draft request for Status Conference (ECF No. 24)	0.20	\$450.00	\$	90.00
10/5/23	Carter Hastings	Email mediator re: missing ADR report	0.20	\$450.00	\$	90.00
10/12/23	Carter Hastings	Read Court Order Granting in part MSJ (ECF No. 26)	0.50	\$450.00	\$	225.00
10/12/23	Carter Hastings	Left client VM re: Case status	0.10	\$450.00	\$	45.00
10/12/23	Carter Hastings	Call with Client re: case status	0.40	\$450.00	\$	180.00
10/13/23	Carter Hastings	Research and prepare supplement to MSJ (ECF No. 27)	4.50	\$450.00	\$	2,025.00
10/15/23	Carter Hastings	Researched and edited supplement to MSJ (ECF No. 27)	1.30	\$450.00	\$	585.00
10/19/23	Carter Hastings	Final review of MSJ Supplement (ECF No. 27)	1.10	\$450.00	\$	495.00
10/19/23	Cliff Gordon	Review and edit supplement (ECF No. 27) to summary judgment	3.5	\$650.00	\$	2,275.00
10/25/23	Carter Hastings	Emailled Opposing Counsel, Read and Responded to email from Court re: Pretrial documents	0.20	\$450.00	\$	90.00
10/26/23	Carter Hastings	Analyze new NLRB joint employer rule	1.50	\$450.00	\$	675.00
10/26/23	Carter Hastings	discuss case status and trial with WCA	0.80	\$450.00	\$	360.00
10/26/23	Carter Hastings	Send emails to and read responses from Opposing Counsel re: settlement, Trial Documents	0.20	\$450.00	\$	90.00
10/26/23	Carter Hastings	Called with Opposing Counsel re: Settlement, Trial Documents	0.10	\$450.00	\$	45.00
10/26/23	Carter Hastings	Draft Joint Stipulated Facts	1.00	\$450.00	\$	450.00
10/26/23	Carter Hastings	Call with Client re: Case Status	0.70	\$450.00	\$	315.00
10/26/23	Carter Hastings	Read Defendants' response to MSJ Supplement (ECF No. 28)	1.00	\$450.00	\$	450.00
10/26/23	Carter Hastings	Draft Plaintiffs Exhibit List (ECF No. 39)	1.00	\$450.00	\$	450.00
10/26/23	Carter Hastings	Draft Plaintiffs Voir Dire (ECF No. 37)	2.50	\$450.00	\$	1,125.00
10/26/23	Carter Hastings	Draft plaintiff's proposed jury instruction and verdict form (ECF No. 36)	3.25	\$450.00	\$	1,462.50
10/26/23	Carter Hastings	draft Plaintiff's statement of facts (ECF No. 35)	0.75	\$450.00	\$	337.50
10/26/23	Carter Hastings	draft Plaintiffs Witness list (ECF No. 38)	0.60	\$450.00	\$	270.00
10/26/23	Clif Alexander	Discuss case status and trial with CTH	0.80	\$650.00	\$	520.00
10/26/23	Clif Alexander	Review and edit all pre-trial documents	3.20	\$650.00	\$	2,080.00
10/27/23	Lauren Brady	Begin review of CTH Draft pre-trial filings and edit same	0.60	\$550.00	\$	330.00
10/27/23	Carter Hastings	Meeting with WCA re: Trial and Settlement	0.40	\$450.00	\$	180.00

10/27/23	Carter Hastings	Call with Client re: Settlement	0.50	\$450.00	\$	225.00
10/27/23	Carter Hastings	Telephonic Conference with Opposing Counsel re: Settlement	0.40	\$450.00	\$	180.00
10/27/23	Carter Hastings	Email draft of joint stipulated facts to Opposing Counsel	0.10	\$450.00	\$	45.00
10/27/23	Carter Hastings	Calls with Opposing Counsel Re: Settlement	0.50	\$450.00	\$	225.00
10/27/23	Carter Hastings	Call with Client re: Settlement	0.50	\$450.00	\$	225.00
10/27/23	Carter Hastings	Draft Notice of Settlement	0.20	\$450.00	\$	90.00
10/27/23	Carter Hastings	Email Opposing Counsel re: Settlement	0.10	\$450.00	\$	45.00
10/27/23	Carter Hastings	Edit to Plaintiff's Exhibit List (ECF No. 39)	0.20	\$450.00	\$	90.00
10/27/23	Carter Hastings	Edit Plaintiff's voir dire questions (ECF No. 37)	0.50	\$450.00	\$	225.00
10/27/23	Carter Hastings	Edit plaintiff's proposed jury instruction and verdict form (ECF No. 36)	0.60	\$450.00	\$	270.00
10/27/23	Carter Hastings	Edit plaintiff's statement of facts (ECF No. 35)	0.20	\$450.00	\$	90.00
10/27/23	Clif Alexander	Meet with CTH on case status and trial	0.40	\$650.00	\$	260.00
11/4/23	Carter Hastings	Call with Client re: Settlement	0.50	\$450.00	\$	225.00
11/4/23	Carter Hastings	Draft Settlement Agreement	3.50	\$450.00	\$	1,575.00
11/5/23	Lauren Brady	Review Draft SA prepared by CTH	0.70	\$550.00	\$	385.00
11/5/23	Carter Hastings	Edit settlement agreement	0.60	\$450.00	\$	270.00
11/6/23	Carter Hastings	Email Opposing Counsel draft settlement agreement	0.10	\$450.00	\$	45.00
11/9/23	Carter Hastings	Email Opposing Counsel re: follow up on settlement agreement	0.10	\$450.00	\$	45.00
11/14/23	Carter Hastings	Email Opposing Counsel re: follow up on settlement agreement	0.10	\$450.00	\$	45.00
11/20/23	Carter Hastings	Email Opposing Counsel re: follow up on settlement agreement	0.10	\$450.00	\$	45.00
11/20/23	Carter Hastings	Email Opposing Counsel re: follow up on settlement agreement	0.10	\$450.00	\$	45.00
11/20/23	Carter Hastings	read email from Opposing Counsel re: settlement agreement	0.20	\$450.00	\$	90.00
11/21/23	Carter Hastings	Review Opposing Counsel's edits to Settlement Agreement and discuss with LB	0.40	\$450.00	\$	180.00
11/21/23	Lauren Brady	Review edits to SA and confer with CTH regarding the same.	0.30	\$550.00	\$	165.00
11/21/23	Carter Hastings	Email Opposing Counsel re: Settlement Agreement terms, counter proposal	0.10	\$450.00	\$	45.00
12/4/23	Carter Hastings	Email Opposing Counsel re: follow up on settlement agreement	0.10	\$450.00	\$	45.00
12/4/23	Carter Hastings	read email from Opposing Counsel re: settlement agreement	0.10	\$450.00	\$	45.00
12/8/23	Carter Hastings	Email Opposing Counsel re: follow up on settlement agreement counter proposal terms	0.10	\$450.00	\$	45.00



12/12/23	Carter Hastings	Called Opposing Counsel re: follow up on Settlement Agreement, left voicemail	0.10	\$450.00	\$	45.00
12/12/23	Carter Hastings	Email Opposing Counsel re: follow up on settlement agreement counter proposal terms	0.10	\$450.00	\$	45.00
12/14/23	Carter Hastings	Call with Client re Case Status	0.50	\$450.00	\$	225.00
12/14/23	Carter Hastings	Discussion with AWA, WCA re: case status and settlement	0.50	\$450.00	\$	225.00
12/14/23	Carter Hastings	Called Opposing Counsel re: follow up on Settlement Agreement, left voicemail	0.10	\$450.00	\$	45.00
12/14/23	Carter Hastings	Email Opposing Counsel re: follow up on settlement agreement counter proposal terms	0.10	\$450.00	\$	45.00
12/14/23	Clif Alexander	Discussion with AWA, CTH on case status	0.50	\$650.00	\$	325.00
12/27/23	Carter Hastings	Draft request for status conference (ECF No. 33)	0.30	\$450.00	\$	135.00
12/27/23	Carter Hastings	Read Court order denying status conference (ECF No. 34)	0.20	\$450.00	\$	90.00
12/27/23	Carter Hastings	Called client re: Case status, left voicemail	0.10	\$450.00	\$	45.00
12/28/23	Carter Hastings	Call with Client re: Case status	0.50	\$450.00	\$	225.00
1/2/24	Carter Hastings	Emailled Opposing Counsel re: follow up on draft joint stipulated facts	0.20	\$450.00	\$	90.00
1/2/24	Carter Hastings	Edits and final review of pre-trial documents before filing	1.10	\$450.00	\$	495.00
1/2/24	Carter Hastings	Call with Client re: Case status	0.75	\$450.00	\$	337.50
1/2/24	Cliff Gordon	Review and edit plaintiff's pretrial documents (ECF Nos. 36-39)	3	\$650.00	\$	1,950.00
1/5/24	Carter Hastings	Read Court Judgment (ECF Nos. 40, 41), emailed copies to Client, Call with Client	1.10	\$450.00	\$	495.00
1/5/24	Clif Alexander	Review order and final judgment	0.50	\$650.00	\$	325.00
1/8/24	Carter Hastings	Sent copy of Court Judgment (ECF No. 41) to Opposing Counsel	0.10	\$450.00	\$	45.00
1/8/24	Carter Hastings	Telephonic Conference with Opposing Counsel re: Final Judgment	0.30	\$450.00	\$	135.00
1/9/24	Clif Alexander	Meet with CTH on case status and trial	0.50	\$650.00	\$	325.00
1/15/24	Lauren Brady	Begin draft of Fee Motion	0.60	\$550.00	\$	330.00
1/19/24	Lauren Brady	Finalize draft of Fee Motion and prepare for filing	3.90	\$550.00	\$	2,145.00
			<b>168.45</b>		<b>\$</b>	<b>85,232.50</b>